

IN THE DISTRICT COURT OF THE UNITED STATES  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

UNITED STATES OF AMERICA )  
 )  
 v. ) CR. NO. 2:06cr144-WKW  
 )  
 PAUL MEREZ GRAHAM )

**UNOPPOSED MOTION TO CONTINUE TRIAL**

Comes now the United States of America, by and through Leura G. Canary, United States Attorney for the Middle District of Alabama, and as grounds for this Motion, states as follows:

1. Trial for the above referenced defendant is presently scheduled for January 8, 2007, before the Honorable William Keith Watkins. A suppression hearing is presently scheduled for November 17, 2006. The United States is unable to proceed with the suppression hearing as scheduled because an essential government witness is unavailable for the hearing. The United States moved to continue the suppression hearing until after December 1, 2006.

2. A delay in the Suppression Hearing will not give the parties adequate time to assess the impact of the suppression ruling and/or file objections to the suppression ruling before the District Court. The United States respectfully moves to continue the trial of the above-referenced defendant. Defense has no objections to the motion to continue the suppression hearing and trial.

Respectfully submitted this the 16th day of November, 2006.

LEURA G. CANARY  
UNITED STATES ATTORNEY

/s/Tommie Brown Hardwick  
TOMMIE BROWN HARDWICK  
Assistant United States Attorney  
One Court Square, Suite 201  
Montgomery, AL 36104  
Phone: (334)223-7280  
Fax: (334)223-7135  
E-mail: [tommie.hardwick@usdoj.gov](mailto:tommie.hardwick@usdoj.gov)

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## **CERTIFICATE OF SERVICE**

I hereby certify that on November 16, 2006, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: Thomas M. Goggans, Esq.

Respectfully submitted,

/s/Tommie Brown Hardwick  
TOMMIE BROWN HARDWICK  
Assistant United States Attorney  
One Court Square, Suite 201  
Montgomery, AL 36104  
Phone: (334)223-7280  
Fax: (334)223-7135  
E-mail: [tommie.hardwick@usdoj.gov](mailto:tommie.hardwick@usdoj.gov)